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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CR No. 07-0654 CRB
Plaintiff,)	
v.)	STIPULATION AND [PROPOSED]
)	PRETRIAL SCHEDULING ORDER
LINDA NGOZI ASHIEGBU,)	
Defendant.)	

The parties hereby stipulate to the following proposed scheduling order. This schedule assumes that jury selection and opening statements will occur in this matter on October 6, 2008. In addition, this schedule moves the pretrial conference from the previously scheduled date of October 2, 2008 to the afternoon of September 29, 2008. Newly-assigned government counsel, AUSA Adam Reeves, has a previous commitment in Washington D.C. on October 2, 2008. As a result, Government counsel is requesting the re-scheduling of the pre-trial conference to September 29, 2008 and counsel for the defendant have agreed. If the proposed re-scheduled pre-trial conference is unacceptable to the Court, AUSA Allison Danner will proceed alone with

1 the pre-trial conference on October 2, 2008 as originally scheduled.

2 1. On or before August 28, 2008, the government shall certify its compliance with the
3 production of all discovery under Federal Rule of Criminal Procedure 16.

4 2. On or before September 10, 2008, the government shall provide notice of any crimes,
5 wrongs, or acts for which it will seek to provide evidence pursuant to Federal Rule of Evidence
6 404(b), shall provide any disclosures required by *Brady*, *Jencks*, and *Giglio*, and shall identify
7 any expert witnesses.

8 3. On or before September 11, 2008, the defendant shall certify her compliance with the
9 production of all discovery under Federal Rule of Criminal Procedure 16.

10 4. On or before September 17, 2008, the parties shall file any Motions *in Limine* and
11 Proposed Jury Instructions, Proposed Voir Dire Questions, and Proposed Verdict Forms.

12 5. On or before September 18, 2008, the defendant shall verify her compliance with
13 *Jencks*.

14 6. On or before September 22, 2008, the parties shall file any oppositions to Motions *in*
15 *Limine*.

16 7. On or before September 23, 2008, the defendant shall identify her expert witnesses, if
17 any.

18 8. On or before September 23, 2008, the government shall file its Witness and Exhibit
19 Lists.

20 9. On or before September 24, 2008, the parties shall file any replies to any Motions *in*
21 *Limine*.

22 10. On or before September 25, 2008, the defendant shall file her Witness and Exhibit
23 Lists.

24 11. The parties agree to identify the witnesses that they intend to call the following day
25 during trial and to make a good-faith effort to describe the order of witnesses by 7 p.m. on the
26 evening before the testimony.

27 12. On September 29, 2008, at 2:30 p.m., the pretrial conference shall occur and there
28

1 shall be a hearing on any Motions *in Limine* upon which the Court wishes to hear argument.

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4 JOSEPH P. RUSSONIELLO
United States Attorney

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6 DATED: August 22, 2008

7 \s\
ALLISON MARSTON DANNER
ADAM A. REEVES
Assistant United States Attorneys

8
9 DATED: August 22, 2008

10 \s\
BARRY J. PORTMAN
Federal Public Defender
STEVEN G. KALAR
Assistant Federal Public Defender
JODI LINKER
Counsel for Linda Ashiegbu

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12
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14 IT IS SO ORDERED.

15 DATED: _____

16 HONORABLE CHARLES R. BREYER
United States District Court Judge